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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
Northern Division

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DAVID B. KAPLAN, ESQ.,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS, LLC,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS INTERNATIONAL, LTD.,
and MANNA INTERNATIONAL
ENTERPRISES, INC.,

Defendants,

and

LISA M. KAPLAN,
THE WATER-WALKING
FOUNDATION, INC., and
MANNA INVESTMENTS, LLC,

Relief Defendants.

Case No. 3:16-cv-00270-MMD-VPC

Honorable Miranda M. Du

**ORDER GRANTING STIPULATION
TO EXTEND TIME TO FILE A
MOTION FOR AN ORDER TO
DISBURSE THE DISTRIBUTION FUND**

**THIRD REQUESTED EXTENSION OF
TIME TO FILE A MOTION FOR AN
ORDER TO DISBURSE**

1 IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, as
2 follows:

3 1. On May 10, 2024, the Court ordered that Plaintiff United States Securities and
4 Exchange Commission (the “SEC”) shall file a Motion to Approve the Distribution Plan (the
5 “Distribution Plan”) by July 31, 2024, and a Motion for an Order to Disburse the Distribution Fund
6 (the “Motion”) by December 2, 2024. (ECF No. 175). The SEC filed the Motion to Approve the
7 Distribution Plan on July 31, 2024, and the Court approved the Distribution Plan on August 30,
8 2024. (ECF No. 182).

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10 2. On September 30, 2024, Plan Notice and Certification Forms were mailed to 23
11 Preliminary Claimants. *See Status Report of Rust Consulting, Inc.* (ECF No. 183). To be
12 considered eligible for a distribution payment from the Distribution Fund, a Preliminary Claimant
13 was required to complete and return the Certification Form, along with any supporting
14 documentation, by November 14, 2024. *Id.*

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16 3. As of this date, 11 of the 23 Preliminary Claimants have returned the Certification
17 Form. Three Preliminary Claimants submitted disputes to the information provided by the
18 Distribution Agent on the Certification Forms and the Distribution Agent and the SEC have been
19 working to resolve the disputes.

20
21 4. Unfortunately, information submitted with certain disputes conflicts with other
22 information received by the Distribution Agent. The SEC is requesting additional time to
23 independently verify information contained in the disputes, steps which may include subpoenaing
24 bank records or obtaining other third-party verification.

25
26 5. On December 10, 2024, the Court granted the SEC’s first request to extend the
27 deadline for filing the Motion to December 13, 2024. (ECF No. 186). On December 13, 2024, the
28

1 Court granted the SEC's second request to extend the deadline for filing the Motion to December
2 20, 2024. (ECF No. 188).

3 6. The SEC and counsel for Dean Properties, LLC have agreed to a third extension,
4 during which time the Distribution Agent and the SEC will continue to work to resolve the three
5 disputes submitted by the Preliminary Claimants.
6

7 7. Accordingly, the Parties respectfully request that the time to file the Motion for an
8 Order to Disburse be extended until March 21, 2025. If the SEC is able to independently verify or
9 confirm the information provided in the disputes earlier than March 21, 2025, we will return to the
10 Court with a Motion for an Order to Disburse at that time.
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13

14 /s/ Adriene Mixon
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Counsel for Dean Properties, LLC.

IT IS SO ORDERED:

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25 The Honorable Miranda M. Du
26 United States District Judge
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DATED: December 19, 2024